

Mark Perkins

June 12, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Ave, NW
Washington DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir/Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Mannatech Independent Associate. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Mannatech products.

One of the most confusing and burdensome sections of the proposed rule is the 7 day waiting period to enroll new associates. One can buy a Mannatech's sales kit for only \$99. People buy TVs, cars, and other items that cost much more than that and they do not have to wait 7 days. This waiting period gives the impression that there might be something wrong with the plan. I also think this 7 day waiting period is unnecessary, because Mannatech already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last 12 months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Mannatech and will then have to send in many reports to Mannatech headquarters.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Mannatech is found guilty. Otherwise, Mannatech and I are put at an unfair advantage even though Mannatech has done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. One's eagerness to *protect one group* should not inadvertently *make victims of another group*. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of 10 prior purchasers, I will need to send the address of the prospective purchaser to Mannatech headquarters and then wait for the list. I also think the following disclosure required by the proposed rule will turn a lot of people off unnecessarily: "If you buy a

business opportunity from the seller, your contact information can be disclosed in the future to other buyers.” People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been a Mannatech Independent Associate for 2 years. Originally, I became a Mannatech Independent Associate because I like the products and wanted to earn some additional money. I am depending on this business to supplement my income.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

Mark Perkins